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*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

STEVE RABIN and JOHN CHAPMAN,  
on behalf of themselves, and all others  
similarly situated,

Plaintiffs,

v.

PRICEWATERHOUSECOOPERS LLP,

Defendant.

Case No. 16-cv-02276-JST

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
RE PROCESS FOR PRODUCTION OF  
ELECTRONICALLY STORED  
INFORMATION (ESI)**

Hon. Judge Jon S. Tigar

1 WHEREAS, on February 16, 2017, the Court instructed Plaintiffs and  
2 PricewaterhouseCoopers LLP (“PwC”), to meet and confer regarding electronically stored  
3 information (“ESI”) and file this stipulation;

4 WHEREAS, today, the Court entered a Minute Order, ECF No. 72, instructing the Parties  
5 to submit, today, “a joint stipulation or competing proposals establishing a date for the  
6 submission of a discovery letter brief addressing ESI”;

7 WHEREAS, the Parties have met and conferred by telephone today and reached  
8 agreement on a process for ESI discovery and a deadline for submission of any disagreement  
9 regarding ESI discovery;

10 THEREFORE, IT IS HEREBY STIPULATED that:

- 11 • Wednesday, March 1, 2017: Plaintiffs will provide to PwC their opening proposal  
12 regarding custodians, sources of ESI, and potential search terms, noting which  
13 search terms are related to which document requests. Plaintiffs intend to include  
14 some questions regarding who the most appropriate custodians should be for  
15 certain topics; PwC reserves all rights with respect to the propriety of such  
16 questions. The parties may use traditional search terms or another method, such as  
17 technology-assisted review (“TAR”), depending on their negotiations in the next  
18 step.
  - 19 • March and April 2017: The parties will negotiate regarding custodians, sources,  
20 search process (e.g., traditional search terms, TAR, etc.).
  - 21 • Friday, April 28, 2017: The parties will file a notice stating either (a) their  
22 agreement as to these issues or (b) their need to file a joint letter brief regarding  
23 areas of disagreement by May 9, 2017
  - 24 • Later: PwC will collect, process, and produce the ESI on a rolling basis.
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Respectfully submitted,

Dated: February 17, 2017

By: /s/ Jahan C. Sagafi  
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*Counsel for Plaintiffs and Proposed Class and  
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1 Dated: February 17, 2017

By: /s/ Emily Nicklin  
Emily Nicklin

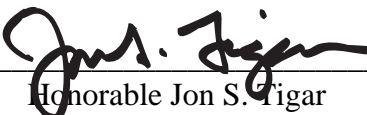
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22 *Attorneys for Defendant*

1 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**  
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4 Date: February 21, 2017  
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Honorable Jon S. Tigar  
United States District Judge